

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar No. 14853

SATHYA OUM, CSBN 255431
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (510) 970-4846
Facsimile: (415) 744-0134
E-Mail: sathya.oum@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LARONDA WOODS,
Plaintiff,
vs.
KILOLO KIJAKAZI,
Acting Commissioner of Social Security,¹
Defendant.
Case No.: 3:21-cv-0357-CLB
MOTION FOR EXTENSION OF TIME TO FILE
CERTIFIED ADMINISTRATIVE RECORD AND
ANSWER
(SECOND REQUEST)

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and through her undersigned attorneys, hereby moves for a 7-day extension of time to file the Certified Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s Complaint are due to be filed by January 24, 2022. This is the Commissioner’s second request for an extension of time.

Defendant makes this request in good faith and with no intention to delay proceedings unnecessarily. While the Answer and CAR are ready to be filed, the CD copies of the CAR that must be sent to the Pro-Se Plaintiff are not yet prepared. The undersigned was out sick for two weeks and did not provide enough notice to have the CD copies prepared. As such, she requests that this Court grant an additional week to have the CDs prepared and sent to the US Attorney's office, who will then send the CDs to Plaintiff.

The undersigned is unable to reach Plaintiff.

It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR and answer to Plaintiff's Complaint, through and including January 31, 2022.

Dated: January 24, 2022

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Sathya Oum
SATHYA OUM
Special Assistant United States Attorney

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: January 24, 2022

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER; DECLARATION OF JEBBY RASPUTNIS** by electronically filing the foregoing with the Clerk of the District Court using its ECF System and by U.S. Mail to the following:

LaRonda Woods
4110 Rio Poco Rd.
Reno, NV 89502

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 24, 2022

/s/ Sathya Oum
SATHYA OUM
Special Assistant United States Attorney